

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

Wells-Gardner Electronics	)	
Corporation	)	
Plaintiff,	)	
	)	No.
v.	)	
	)	
C. Ceronix, Inc.	)	
	)	
Defendant.	)	

**COMPLAINT**

The plaintiff, WELLS-GARDNER ELECTRONICS CORPORATION [hereinafter “WELLS-GARDNER”], for its Complaint against C. CERONIX, INC. [hereinafter “CERONIX”], states:

**THE PARTIES**

1. WELLS-GARDNER is a corporation organized under the laws of the State of Illinois and having a principal place of business at 9500 W. 55<sup>th</sup> Street, McCook, Illinois.

2. CERONIX is a corporation organized under the laws of the State of California and having a principal place of business at 13350 New Airport Road, Auburn, California.

**JURISDICTION AND VENUE**

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over CERONIX because CERONIX regularly transacts business within this judicial district and has committed acts of patent

infringement in this judicial district, thereby causing injury to WELLS-GARDNER in this district.

5. Venue lies within this judicial district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). Defendant CERONIX regularly transacts business in this district and has committed acts of patent infringement within this district, thereby causing injury to WELLS-GARDNER in this district.

**CLAIM I – INFRINGEMENT OF U.S. PATENT NO. 7,453,685**

6. On November 18, 2008, the United States Patent and Trademark Office duly and legally issued United States Patent No. 7,453,685, entitled “Mountable Frame For Holding Flat Panel Display and Methods of Mounting Frame For Holding Flat Panel Display.”

7. WELLS-GARDNER owns the ‘685 patent by assignment from the inventors.

8. Defendant CERONIX has infringed at least claim 2 of the ‘685 patent by making, using, selling, offering to sell, or importing into the United States, devices that embody the claims of the ‘685 patent, including at least the 1905-LCD, 1906-LCD and 1908-LCD model display units.

9. CERONIX’ infringement of the ‘685 patent has caused damage to WELLS-GARDNER.

10. WELLS-GARDNER has placed the notice required by 35 U.S.C. § 287 on devices that embody the claims of the ‘685 patent manufactured, offered for sale, or sold by it within the United States.

WHEREFORE, WELLS-GARDNER prays that this Court enter judgment in WELLS-GARDNER’s favor and against CERONIX for:

A. Damages adequate to compensate WELLS-GARDNER for the infringement that

has occurred;

- B. Prejudgment interest from the date infringement of the '685 Patent began;
- C. All costs of this action;
- D. Increased damages under 35 U.S.C. § 284;
- E. Attorneys' fees under 35 U.S.C. § 285;
- F. A permanent injunction prohibiting further infringement of the '685 Patent; and
- G. Such other and further relief as this Court may deem proper.

**JURY DEMAND**

WELLS-GARDNER requests a trial by jury on all issues triable by jury.

Respectfully submitted,  
WELLS-GARDNER ELECTRONICS  
CORPORATION

By: 

Date: April 23, 2010

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